

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA : 13-CR-461 (SJ)

v. :

MARLENY AMPARO TORRES : October 10, 2014

MOTION TO MODIFY CONDITIONS OF RELEASE

The Defendant, Marleny Amparo Torres, through the undersigned counsel, hereby moves this Court to modify the Defendant's conditions of release. In support of this request the defendant asks the Honorable Court to consider the following:

1. The Defendant, Marleny Amparo Torres, has been free on conditions of release in this case since December 30, 2013.
2. Upon her release from detention on December 20, 2013, Ms. Torres was placed on electronic monitoring as a condition of her release.
3. Since her release from pretrial detention, Ms. Torres has been in full compliance with all of her conditions of release and has worn the electronic bracelet since that date.
4. Ms. Torres proposes the following additional surety in support of this motion to modify the conditions of her release: Mr. Fabian Cano of 127 Wardwell Street, Stamford, Connecticut 06902. Mr. Cano is currently employed by Leros Limo Company in Hawthorne, New York as a limousine driver earning \$45,000.00 to \$50,000.00 annually.

Mr. Cano will execute a non-surety bond in the amount of \$150,000.00 as additional surety in support of this motion to modify her conditions of release.

5. United States Probation Officer Anna Lee, who is currently monitoring Ms. Torres for the United States Probation Office for the Eastern District of New York has been informed of his request and she no objection to the granting of this motion.
6. Assistant United States Attorney Adrián Rosales has been informed of this request and he has verified the suitability of Mr. Cano to serve as additional surety for Ms. Torres. He has informed the undersigned that he has no objection to this request.
7. Ms. Torres requests that her conditions of release be modified so that her daily home curfew will be from 11 p.m. to 7 a.m. or as approved by Pretrial Services and she will be permitted to work overnight with prior authorization from Pretrial Services.

Wherefore the Defendant moves this Court to grant this motion to modify the conditions of her release.

Respectfully submitted,
MARLENY AMPARO TORRES

By: /s/ 2809572
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CERTIFICATION

This is to certify that the foregoing Defendant's Motion was transmitted electronically this 10th day of October, 2014, through the district court filing system to all counsel and pro-se parties of record who are able to receive such electronic filings.

By: /s/ 2809572
Francis L. O'Reilly